

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: PAUL J. ROTHROCK** : **CASE NO.:** [1:19-bk-01623-HWV](#)  
**AMANDA S. KRANG,** :  
**Debtors** :

**DEBTOR'S MOTION TO AUTHORIZE WAGE ATTACHMENT**

**AND NOW COMES**, Debtor, Paul J. Rothrock, by and through his attorneys, Jacobson, Julius & Harshberger, and hereby files this Motion to Authorize Wage Attachment and in support thereof states as follows:

1. Debtor filed a Chapter 13 Petition on April 19, 2019.
2. Debtor receives regular income from employment at the Rite Aid Corporation that may be attached under 11 U.S.C § 1326 to fund Debtor's Chapter 13 Plan.
3. The likelihood of success in this case will be much greater if Debtor's income is attached to fund the plan.
4. Debtor consents to the wage attachment.

**WHEREFORE**, Debtor respectfully requests that this Court enter an order directing the above-mentioned employer to pay the Chapter 13 Trustee in the amount set forth in the attached *Order*.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: May 6, 2019

s/Chad J. Julius  
ID# 209496  
8150 Derry Street  
Harrisburg, PA 17111.5260  
717.909.5858  
717.909.7788 [fax]

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**AMANDA S. KRANG,** :  
**Debtor** :

**DEBTOR'S CONSENT TO  
VOLUNTARY WAGE ATTACHMENT**

I, Paul J. Rothrock, do hereby consent to an attachment of my wages for the purpose of funding my Chapter 13 Plan.

Date: May 3, 2019

s/ Paul J. Rothrock \_\_\_\_\_

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**Debtor** :

**PROOF OF SERVICE**

**AND NOW**, this 6<sup>th</sup> day of May, 2019, I, Colleen Reed, with Jacobson, Julius & Harshberger, attorneys for the Debtor, hereby certify that on this day I served the within *Motion to Authorize Wage Attachment* upon the following persons by forwarding the same via CM/ECF or first class mail—

Charles J. DeHart, III, Esq.  
8125 Adams Drive  
Hummelstown, PA 17036

Office of U.S. Trustee  
POB 969  
Harrisburg, PA 17108.0969

Rite Aid Corporation  
Attn: Human Resources.  
30 Hunter Lane  
Camp Hill, PA 17011

By: s/Colleen Reed  
Colleen Reed, Paralegal

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**AMANDA S. KRANG,** :  
**Debtor** :

**ORDER**

UPON CONSIDERATION of the above-referenced Debtor having filed a *Petition* under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

**IT IS HEREBY ORDERED** that until further *Order* of this Court, the entity from whom Debtor receives income:

Rite Aid Corporation  
Attn: Human Resources.  
30 Hunter Lane  
Camp Hill, PA 17011

should deduct from said Debtor's income the sum of **\$197.00 from each bi-weekly paycheck**, beginning on the next pay day following receipt of this *Order* and deduct a similar amount each pay period thereafter, including any period from which Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor and to remit the deductible sums to:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
POB 7005  
Lancaster, PA 17604

**IT IS FURTHER ORDERED** that the entity from whom Debtor receives income shall notify the above listed Trustee if Debtor's income is terminated and the reason therefore.

**IT IS FURTHER ORDERED** that all remaining income of Debtor, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to Debtor in accordance with usual payment procedure.

**IT IS FURTHER ORDERED** that the entity from whom Debtor receives income will place the Bankruptcy Case Number [[1:19-bk-01623-HWV](#)] and the name of Debtor on all checks being forwarded to the above listed Trustee to ensure proper accounting of the funds.